## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

DIANA CRANFIELD,	) Case No. 5:20-cv-02565
Plaintiff,	) Magistrate Judge Carmen E. Henderson
VS.	) PLAINTIFF'S MOTION FOR
COSTCO WHOLESALE CORPORATION,	<ul><li>) EXTENSION OF TIME TO FILE BRIEF</li><li>) IN OPPOSITION TO DEFENDANT'S</li><li>) MOTION FOR SANCTIONS</li></ul>
Defendant.	)

Plaintiff Diana Cranfield respectfully requests a ten-day extension of time, until December 9, 2022, within which to file her Brief in Opposition to Defendant's motion for sanctions. Additional time is needed because most of the response time was consumed by days in trial, the need following trial to attend to other cases and matters not addressed during the week of trial, a need to rest, as well as the Thanksgiving holiday period during which counsel has had two of his children in town staying with him who he wanted to spend time with, as he does not see them often. As a result, Plaintiff requires additional time to prepare a response to Defendant's motion. Plaintiff has not requested any prior extensions. Moreover, Defendant will not be prejudiced by the requested extension, as the motion was mooted by the jury verdict that provided the relief requested by Defendant in its motion.

For the reasons set forth above, Plaintiff respectfully requests a ten-day extension of time, until December 9, 2022, within which to file her Brief in Opposition to Defendant's motion for sanctions.

Respectfully submitted,

/s/ David W. Neel

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Attorney for Plaintiff

## **CERTIFICATE OF SERVICE**

I hereby certify that on November 25, 2022, I electronically filed the foregoing *Motion for Extension of Time*. All parties and counsel of record will receive service of this filing through the Court's electronic filing system and may access the filing through the Court's system.

/s/ David W. Neel
David W. Neel (0033611)